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July 7, 2020

Honorable Vernon S. Broderick
United District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: *Safari Gallery, Inc. v. The Italian Republic*, Civil Action No. 1:19-10507-VSB

Dear Judge Broderick:

I represent the Plaintiff, Safari Gallery, Inc. in the above-referenced case. I am writing to Your Honor today pursuant to Rules 1.A. and 1.G. and consistent with Rule 4.G. of Your Honor's Individual Rules and Practices in Civil Cases and consistent with the Court's Local Rules.

On June 22, 2020, the Defendant in this case filed a motion to dismiss the Complaint pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure. [ECF #13]. On June 25, 2020, the Court entered an Order providing, *inter alia*, that if Plaintiff intends to file an Amended Complaint, it must be filed by July 13, 2020. [ECF #16]. Plaintiff does, indeed, intend to file an Amended Complaint. I am writing today, however, to respectfully request a seven (7) day extension of time, from July 13, 2020 to July 20, 2020, to file the Amended Complaint.

This is the Plaintiff's first request for an extension of time in this case. I have consulted with opposing counsel and represent to the Court that this request is unopposed. I make the request because of obligations that have arisen in two cases involving emergency litigation in the U.S. Court of Appeals for the D.C. Circuit and in the U.S. District Court for the District of Columbia. In the former case, I filed an emergency motion yesterday and today the Court issued an Order requiring all briefing to be completed by both parties this week. In the latter case, I have to file a motion for preliminary injunctive relief this week which must be litigated on a truncated schedule because of an upcoming date in the election schedule. I am a solo practitioner with no office staff and these two matters have arisen in the middle of obligations in other cases as well.

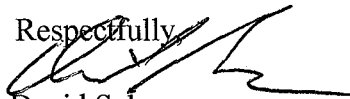
I respectfully submit that the reason for the extension constitutes good cause and the extension is unopposed and will not prejudice any party or cause any significant delay. It will not

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affect any date other than moving by one week the date by which a response to the Amended Complaint will be due to be filed.

Accordingly, based on the foregoing, the undersigned respectfully requests a seven (7) day extension of time, from July 13, 2020 until July 20, 2020 for the Plaintiff to file its Amended Complaint in the above-referenced case.

Respectfully,



David Schoen

cc: All counsel of record (via ECF)